

REMARKS

In light of the amendments to the application noted above and remarks to follow, reconsideration and allowance of the above-referenced application are respectfully requested.

Claims 1-38 are pending. Claims 1-14 are the original patent claims and stand unamended. Claims 15-38 are added claims.

At paragraph 4 of the outstanding Office Action, the Examiner has rejected claims 15, 17, 19, 21, 22, 33, 35-36 and 38 under 35 U.S.C. §103(a) as being unpatentable over Kanno et al. (U.S. Patent No. 5,229,868) in view of Matsumura (U.S. Patent No. 5,148,499). Applicant respectfully traverses the rejection.

Independent claim 1 recites "said class data obtained by learning with at least a training digital image having a high resolution component." Thus, the learning is based upon a high resolution training image. As is shown at page 6, lines 1-36, a mapping table is "learned" by correlating the pixels of a lower resolution image to those of a high resolution image. The mapping table is not generated by interpolation, but rather is generated by selecting a number of low resolution pixels in a low resolution image to define a class, and defining a high resolution portion of an image corresponding to this class. Thus, the high resolution image is used to define the high resolution data corresponding to the pixels of a low resolution class that is later to be used for interpolation.

In opposition to this, in Kanno et al. the "map tables" are formed by interpolation of lower resolution data. Thus, rather than providing a correspondence between a low resolution

class and high resolution pixel data as is done in accordance with the invention, low resolution data is interpolated to generate high resolution data to be stored. This is no more than pre-interpolation of data, and does not rely on a training digital image having a high resolution component. While the Examiner relies upon column 1, lines 35-45 of Kanno et al. to teach this feature, Applicant submits that this language fails to teach the claimed invention, rather teaching an interpolation procedure to generate a high resolution image and pre-storing this high resolution data so that it is readily available.

Independent claims 15, 19, 33 and 36 recite similar limitations. The invention as set forth in these claims therefore precludes the need to interpolate any of the high definition data and results in a more accurate high definition image corresponding to each class definition. Therefore, because the combination of references relied upon by the Examiner fails to depict this feature as claimed in the independent claims noted above, Applicant respectfully requests that the rejection of independent claims 15, 19, 33 and 36 under 35 U.S.C. §103(a) be withdrawn.

Furthermore, dependent claims 17, 21, 22, 35 and 38 depend, either directly or indirectly, from one of independent claims 15, 19, 33 or 36, and are therefore allowable as depending from allowable independent base claims. Additionally, each of these claims presents an independently patentable combination in and of its own right, and is therefore patentable for this additional reason. Applicant therefore similarly requests that the rejection of claims 17, 21, 22, 35 and 38 under 35 U.S.C. §102(e) be withdrawn.

At paragraph 5 of the outstanding Office Action, the Examiner has rejected claims 18, 23, 25, 26, 27, 30 and 32 under 35 U.S.C. §103(a) as being unpatentable over Kanno et al. and

Matsumura, and further in view of Collins (U.S. Patent No. 4,587,556). Applicant respectfully traverses the rejection.

Independent claims 23, 27 and 30 include limitations similar to those noted above with respect to independent claims 15, 19, 33 and 36, specifically that the class data is obtained by learning using a training video signal of a second standard having a second resolution that is higher than the first resolution. Because Collins fails to cure the defects of Kanno et al. and Matsumura noted above, Applicant submits that independent claims 23, 27 and 30 are allowable over the combination of prior art relied upon by the Examiner, and therefore respectfully requests that the rejection of claims 23, 27 and 30 under 35 U.S.C. §103(a) be withdrawn.

Furthermore, claims 18, 25, 26, 29 and 32 depend, either directly or indirectly from an independent allowable claim, and are therefore allowable as depending from an allowable independent base claim. Additionally, each of these claims depicts an independently patentable combination in and of its own right. For these reasons, Applicant respectfully requests that the rejection of claims 18, 25, 26, 29 and 32 under 35 U.S.C. §103(a) be withdrawn.

At paragraph 6 of the outstanding Office Action, the Examiner has rejected claims 16, 20, 34 and 37 under 35 U.S.C. §103(a) as being unpatentable over Kanno et al. and Matsumura and further in view of Tararine et al. (U.S. Patent No. 5,048,102). Applicants respectfully traverse the rejection.

Claims 16, 20, 34 and 37 each depend from one of the independent claims noted above, and therefore is allowable as depending from an allowable independent base claim. Additionally, because Tararine et al. fails to cure the defects noted above with respect to Kanno et al. and

Matsumura, Applicant submits that each of these claims also presents an independently patentable combination in and of its own right. Applicant therefore respectfully requests that the rejection of claims 16, 20, 34 and 37 under 35 U.S.C. §103(a) be withdrawn.

Applicant notes with appreciation the notice that claims 1-14 are allowable over the prior art of record. To the extent the Examiner's stated reasons for allowability imply or are construed to mean that the claims are allowable over the prior art of record because the Examiner believes the claims should be interpreted to include one or more features or limitations not recited therein, Applicant's attorney disagrees with such an interpretation. It is the intent of Applicant, by his attorney, to construe the allowed claims so as to cover the invention disclosed in the instant application and all equivalents to which the claimed invention is entitled.

CONCLUSION

Statements appearing above in respect to the disclosures and the cited references represent the present opinion of Applicant's undersigned attorney and, in the event that the Examiner disagrees with any of such opinions, it is respectfully requested that the Examiner specifically indicate those portions of the reference providing a basis for a contrary view.

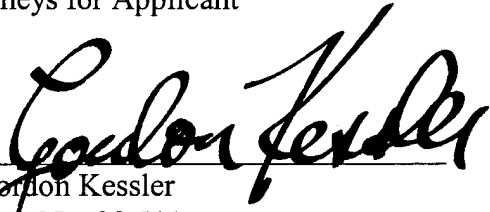
Applicant has made a diligent effort to place claims 15-38 in condition for allowance, and notice of the allowance of these claims in addition to claims 1-14 is earnestly solicited. If the Examiner is unable to issue a Notice of Allowance regarding these claims, the Examiner is requested to contact the undersigned attorney in order to discuss any further outstanding issues.

Early and favorable consideration is respectfully requested.

Please charge additional fees incurred by reason of this response or credit any
overpayment to Deposit Account No. 50-0320.

Respectfully submitted,

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